

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Clem C. Trischler, Esq.,  
PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP  
38<sup>TH</sup> Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219**  
*Attorneys for Defendants Mylan Pharmaceuticals Inc. (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Katie Reed, Senior Manager, Portfolio Development, on February 16, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, 38<sup>th</sup> Floor, One Oxford Center, Pittsburgh, Pennsylvania 15219, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

CHARLIE WHORTON  
Rivero Mestre LLP  
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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 2, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Ruben Honik  
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**EXHIBIT A**

**30(B)(6) TOPICS**

*On behalf of Mylan Pharmaceuticals Inc.:*

*Mylan's Communications with Finished Dose Customers and Downstream Customers*

42. All credits, indemnification, refunds, and/or penalties paid or provided by or to Mylan in connection with the nitrosamine contamination of Mylan's valsartan API and finished dose.

*Product Testing*

46. Tracing of batches and lots of Mylan's valsartan API sold downstream and ultimately intended for use by consumers in the United States.

47. Tracing of batches and lots of Mylan's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States.

48. The pricing of Mylan's valsartan API that was ultimately sold in the United States.

49. The pricing of Mylan's valsartan finished dose that was ultimately sold in the United States.

50. The gross and net profits to Mylan from the sale of Mylan's valsartan API in the United States.

51. The gross and net profits to Mylan from the sale of Mylan's valsartan finished dose in the United States.

52. The quantity/units of Mylan's valsartan finished dose sold in the United States.

53. Mylan's valsartan API sales and pricing data produced by you in this litigation.

54. Mylan's valsartan finished dose sales and pricing data produced by you in this litigation.

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Katie Reed.
2. The complete production of Katie Reed's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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